

Thanks.

**From:** Rogalski, Alan <[arogalski@wnj.com](mailto:arogalski@wnj.com)>  
**Date:** Tuesday, June 17, 2025 at 12:38 PM  
**To:** Alexander Loftus <[alex@loftusandeisenberg.com](mailto:alex@loftusandeisenberg.com)>  
**Subject:** RE: [EXTERNAL] Re: Subpoena Response [WNJ-WNJDMS.FID14056720]

Alex, I'd estimate that we are about a week away from production. The extraction of the data off ClaimChoice's servers has been challenging and has required the services of our e-discovery team, ClaimChoice's IT team and an outside tech vendor.

Contact me with any questions.

**From:** Alexander Loftus <[alex@loftusandeisenberg.com](mailto:alex@loftusandeisenberg.com)>  
**Sent:** Wednesday, June 04, 2025 3:52 PM  
**To:** Rogalski, Alan <[arogalski@wnj.com](mailto:arogalski@wnj.com)>  
**Subject:** Re: [EXTERNAL] Re: Subpoena Response [WNJ-WNJDMS.FID14056720]

Can you give me an ETA for the remainder?

**From:** Rogalski, Alan <[arogalski@wnj.com](mailto:arogalski@wnj.com)>  
**Date:** Wednesday, June 4, 2025 at 2:50 PM  
**To:** Alexander Loftus <[alex@loftusandeisenberg.com](mailto:alex@loftusandeisenberg.com)>  
**Subject:** RE: [EXTERNAL] Re: Subpoena Response [WNJ-WNJDMS.FID14056720]

Alex,

As I have informed you recently, we are in the process of responding to multiple requests for the same documents from a number of interested parties. The requests are daunting. We have to utilize third party vendors to extract the electronic data, and we are in the process of procuring the information, but in the interest of cooperation, I am attaching copies of several text messages between Phil Burghardt and Elliot Gorog, which based on our recent discussions, you are most interested in reviewing.

Contact me with any questions.

Al (248.321.3748)



**Alan T. Rogalski | Partner**  
**Warner Norcross + Judd LLP**

**Please note our new address**

2715 Woodward Avenue, Suite 300, Detroit, MI 48201  
d 313.546.6055 | [arogalski@wnj.com](mailto:arogalski@wnj.com) | [profile](#) | [V-Card](#)

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